

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

TECNOMATIC, S.p.A.,)
Plaintiff,)
v.)
REMY, INC.,)
HANSON SYSTEMS, LLC,)
D/B/A EAGLE TECHNOLOGIES GROUP,)
ODAWARA AUTOMATION, INC.,)
REMY INTERNATIONAL, INC.,)
DELCO REMY MEXICO, S.R.L. de C.V.,)
REMY COMPONENTES S. de R.L. de C.V.,)
and DOES 1-10,)
Defendants.)
Case No. 1:11-cv-00991-JMS-TAB

**DEFENDANT HANSON SYSTEMS, LLC,
D/B/A EAGLE TECHNOLOGIES GROUP'S
MOTION TO DISMISS**

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Defendant Hanson Systems, LLC, d/b/a Eagle Technologies Group (“Eagle”), moves to dismiss the Complaint filed by Plaintiff Tecnomatic, S.p.A. (“Tecnomatic”), for the following reasons:

- (1) the trade-secrets claim (Count VI) against Eagle is barred by the statute of limitations;
- (2) the claims against Eagle for tortious interference with contract (Count XIII) and tortious interference with business relations (Count XIV) are barred by the statute of limitations; and
- (3) the unjust-enrichment claim (Count XV) is preempted by the Uniform Trade Secrets Act and is duplicative of the trade-secrets claim.

In support of this motion to dismiss, Eagle is contemporaneously filing a supporting brief. For the reasons discussed in its brief, Eagle respectfully requests that the Court grant the

motion to dismiss and award Eagle all other just and proper relief.

Respectfully submitted:

/s/ Patrick D. Murphy _____.

Patrick D. Murphy (14312-49)
Charles P. Rice (14640-71)
Boveri Murphy Rice, LLP
400 Plaza Building
210 South Michigan Street
South Bend, IN 46601
574-232-0300
574-232-0400 (fax)
pmurphy@bmrlp.com
crice@bmrlp.com

*Attorneys for Defendant Hanson Systems,
LLC, d/b/a Eagle Technologies Group*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document, “Defendant Hanson Systems, LLC, d/b/a Eagle Technologies Group’s Motion to Dismiss,” was electronically filed on August 10, 2011, with the Clerk of the Court using CM/ECF system, which sent electronic notification of such filing to the following counsel of record:

S. Patrick McKey (patrick.mckey@bryancave.com);
Kara E. F. Cenar (kara.cenar@bryancave.com);
Paula L. Zecchini (paula.zucchini@bryancave.com);
Mariangela M. Seale (merili.seal@bryancave.com);
Donald A. Cole (donald.cole@bryancave.com);
Andrew C. Warnecke (andrew.warnecke@bryancave.com);
James E. Michel (jmichel@btlaw.com);
Joseph H. Yeager, Jr. (jay.yeager@bakerd.com);
David M. Allen (david.allen@bakerd.com);
Colby Anne Kingsbury (colby.kingsbury@bakerd.com);
Trina K. Taylor (trina.taylor@bakerd.com); and
Victoria L. Nilles (Victoria.Nilles@ThompsonHine.com).

/s/ Patrick D. Murphy _____.
Patrick D. Murphy (14312-49)